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June 13, 2011

EM/ECF

The Honorable Claire C. Cecchi, USMJ
Federal District Court, District of New Jersey
Martin Luther King, Jr. Federal Building and Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Liafom, LLC et al v. Big Fresh Pictures et al
Federal District Court, D.N.J. 10-00606 (JLL)

I turned to Your Honor's Order on Friday, June 10th. I did not work on June 8th or June 9th owing to my religious practices.

Mr. Cipriano and I are committed to talk this week and schedule depositions.

Mr. Oppenheim has ignored our many deposition and discovery requests for four months. The many correspondences are filed on the docket.*

I have communicated to Mr. Oppenheim that June 29th is set as the date for his deposition, absent agreement otherwise.

I have communicated to Mr. Oppenheim that I reserved a Manhattan film facility, qualified technician, and equipment for review of the properties on June 16th and 17th. And that he must attend absent agreement otherwise.

* Mr. Oppenheim wrote once to deny my request postmarked May 11th as insufficient for him to comply by May 31st. He suggested no other dates, and continued to ignore my letters.

Mr. Oppenheim is alleged to have deceived my clients and his own partners for years, and secure to himself my clients property. His partners have since left him and ask to be indemnified. He has avoided discovery for four months with postal demands, refusal of mail, refusal to reply, demands, conditions, and objections, etc. He has used Court reprieves to liquidate two companies. Though he teaches courtroom acting to lawyers, none defend him in this matter.

If Mr. Oppenheim does not show we will still incur costs.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michael M. Cohen", is written over a light blue horizontal line.

Michael M. Cohen

cc: The Honorable Jose L. Lenares USFM, CM/ECF
Dennis A. Cipriano, Esq., CM/ECF, Certified Mail
Jeff Oppenheim, Certified Mail

MMC/xaj